

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER
LEO-GUERRA, MICHAEL MAERLENDER,
BRANDON PIYEVSKY, BENJAMIN SHUMATE,
BRITTANY TATIANA WEAVER, and
CAMERON WILLIAMS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

**PLAINTIFFS' MOTION TO SEAL THE DECLARATION REGARDING A
TYPOGRAPHICAL CORRECTION TO THE MEMORANDUM OF LAW IN SUPPORT
OF PLAINTIFFS' MOTION TO LIMIT REDACTIONS AS TO NORTHWESTERN AND
YALE**

Pursuant to the Agreed Confidentiality Order (ECF No. 254) and Local Rule 26.2,

Plaintiffs respectfully request that the Court grant this Motion to File Under Seal their

Declaration Regarding a Typographical Correction to the Memorandum of Law in Support of Plaintiffs' Motion to Limit Redactions As to Northwestern and Yale.

In support of its Motions, Plaintiffs state as follows:

1. Plaintiffs' Motion discusses, references, and appends certain information designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality Order entered by this Court.

2. In accordance with Local Rule 26.2(c), Plaintiffs' Motion will continue to be provisionally under seal, but an unredacted version will be provided to counsel and the Court. Additionally, a redacted (public) version will be filed via the ECF system within 14 days.

WHEREFORE, Plaintiffs respectfully request that this Court retain the provisional seal on Plaintiffs' Motion to Limit Redactions As to Northwestern University and Yale University.

Dated: May 30, 2023

Respectfully Submitted,

By: /s/ Robert D. Gilbert

Robert D. Gilbert

Elpidio Villarreal

Robert S. Raymar

Steven Magnusson

**GILBERT LITIGATORS &
COUNSELORS, P.C.**

11 Broadway, Suite 615

New York, NY 10004

Phone: (646) 448-5269

rgilbert@gilbertlitigators.com

pdvillarreal@gilbertlitigators.com

rraymar@gilbertlitigators.com

sschuster@gilbertlitigators.com

amarquez@gilbertlitigators.com

smagnusson@gilbertlitigators.com

/s/ Edward J. Normand

Devin "Vel" Freedman

Edward J. Normand

Peter Bach-y-Rita

FREEDMAN NORMAND

FRIEDLAND LLP

99 Park Avenue

Suite 1910

New York, NY 10016

Tel: 646-970-7513

vel@fnf.law

tnormand@fnf.law

pbachyrita@fnf.law

Daniel J. Walker

Eric L. Cramer
Caitlin G. Coslett
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: 215-875-3000
ecramer@bm.net
ccoslett@bm.net

Richard Schwartz
BERGER MONTAGUE PC
1720 W Division
Chicago, IL 60622
Tel: 773-257-0255
rschwartz@bm.net

Robert E. Litan
Hope Brinn
BERGER MONTAGUE PC
2001 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20006
Tel: 202-559-9745
rlitan@bm.net
dwalker@bm.net
hbrinn@bm.net

Counsel for Plaintiffs